

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO
CENTRAL DIVISION**

THE PEOPLE OF THE STATE OF CALIFORNIA,
Plaintiff,

v.

CHRISTOPHER D DOUGHERTY,
dob 12/08/72;

Defendant

CT No. CD281450
DA No. AEM489
AMENDED
COMPLAINT-FELONY

INFORMATION

Date: _____

COPY

PC296 DNA TEST STATUS SUMMARY

Defendant

DOUGHERTY, CHRISTOPHER D

DNA Testing Requirements

DNA sample has been previously provided

CHARGE SUMMARY

<u>Count</u>	<u>Charge</u>	<u>Issue Type</u>	<u>Sentence Range</u>	<u>Special Allegations</u>	<u>Allegation Effect</u>
1	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
2	PC368(d) DOUGHERTY, CHRISTOPHER D	Felony	2-3-4/\$10,000		
3	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
4	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
5	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
6	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
7	PC368(d) DOUGHERTY, CHRISTOPHER D	Felony	2-3-4/\$10,000		

CHARGE SUMMARY (cont'd)

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
8	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
9	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
10	PC368(d) DOUGHERTY, CHRISTOPHER D	Felony	2-3-4/\$10,000		
11	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
12	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
13	PC368(d) DOUGHERTY, CHRISTOPHER D	Felony	2-3-4/\$10,000		
14	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
15	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
16	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
17	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
18	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
19	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
20	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
21	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
22	PC368(d) DOUGHERTY, CHRISTOPHER D	Felony	2-3-4/\$10,000		
23	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		

CHARGE SUMMARY (cont'd)

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
24	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
25	PC368(d) DOUGHERTY, CHRISTOPHER D	Felony	2-3-4/\$10,000		
26	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
27	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
28	PC368(d) DOUGHERTY, CHRISTOPHER D	Felony	2-3-4/\$10,000		
29	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
30	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
31	PC368(d) DOUGHERTY, CHRISTOPHER D	Felony	2-3-4/\$10,000		
32	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
33	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
34	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
35	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
36	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
37	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
38	PC368(d) DOUGHERTY, CHRISTOPHER D	Felony	2-3-4/\$10,000		
39	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		

CHARGE SUMMARY (cont'd)

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
40	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
41	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
42	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
43	PC368(d) DOUGHERTY, CHRISTOPHER D	Felony	2-3-4/\$10,000		
44	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
45	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
46	PC368(d) DOUGHERTY, CHRISTOPHER D	Felony	2-3-4/\$10,000		
47	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
48	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
49	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
50	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
51	PC368(d) DOUGHERTY, CHRISTOPHER D	Felony	2-3-4/\$10,000		
52	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
53	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
54	PC368(d) DOUGHERTY, CHRISTOPHER D	Felony	2-3-4/\$10,000		
55	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		

CHARGE SUMMARY (cont'd)

<u>Count</u>	<u>Charge</u>	<u>Issue Type</u>	<u>Sentence Range</u>	<u>Special Allegations</u>	<u>Allegation Effect</u>
56	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
57	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
58	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
59	PC368(d) DOUGHERTY, CHRISTOPHER D	Felony	2-3-4/\$10,000		
60	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
61	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
62	PC368(d) DOUGHERTY, CHRISTOPHER D	Felony	2-3-4/\$10,000		
63	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
64	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
65	PC368(d) DOUGHERTY, CHRISTOPHER D	Felony	2-3-4/\$10,000		
66	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
67	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
68	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
69	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
70	PC368(d) DOUGHERTY, CHRISTOPHER D	Felony	2-3-4/\$10,000		
71	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		

CHARGE SUMMARY (cont'd)

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
72	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
73	PC368(d) DOUGHERTY, CHRISTOPHER D	Felony	2-3-4/\$10,000		
74	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
75	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
76	PC368(d) DOUGHERTY, CHRISTOPHER D	Felony	2-3-4/\$10,000		
77	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
78	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
79	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
80	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
81	PC368(d) DOUGHERTY, CHRISTOPHER D	Felony	2-3-4/\$10,000		
82	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5	PC186.11(a)(2)	+2-3-5
83	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
84	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
85	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
86	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
87	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		

CHARGE SUMMARY (cont'd)

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
88	PC368(d) DOUGHERTY, CHRISTOPHER D	Felony	2-3-4/\$10,000		
89	CC25401 DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
90	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
91	PC368(d) DOUGHERTY, CHRISTOPHER D	Felony	2-3-4/\$10,000		
92	CC25401 DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
93	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
94	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
95	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
96	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
97	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
98	PC368(d) DOUGHERTY, CHRISTOPHER D	Felony	2-3-4/\$10,000		
99	CC25110 & 25540(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
100	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
101	PC368(d) DOUGHERTY, CHRISTOPHER D	Felony	2-3-4/\$10,000		
102	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
103	PC368(d) DOUGHERTY, CHRISTOPHER D	Felony	2-3-4/\$10,000		

CHARGE SUMMARY (cont'd)

<u>Count</u>	<u>Charge</u>	<u>Issue Type</u>	<u>Sentence Range</u>	<u>Special Allegations</u>	<u>Allegation Effect</u>
104	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
105	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
106	PC368(d) DOUGHERTY, CHRISTOPHER D	Felony	2-3-4/\$10,000		
107	CC25401 DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
108	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
109	PC368(d) DOUGHERTY, CHRISTOPHER D	Felony	2-3-4/\$10,000		
110	CC25401 DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
111	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
112	PC368(d) DOUGHERTY, CHRISTOPHER D	Felony	2-3-4/\$10,000		
113	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
114	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
115	PC368(d) DOUGHERTY, CHRISTOPHER D	Felony	2-3-4/\$10,000		
116	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
117	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
118	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
119	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		

CHARGE SUMMARY (cont'd)

Count	Charge	Issue Type	Sentence Range	Special Allegations	Allegation Effect
120	PC368(d) DOUGHERTY, CHRISTOPHER D	Felony	2-3-4/\$10,000		
121	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
122	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
123	PC368(d) DOUGHERTY, CHRISTOPHER D	Felony	2-3-4/\$10,000		
124	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
125	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
126	PC368(d) DOUGHERTY, CHRISTOPHER D	Felony	2-3-4/\$10,000		
127	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
128	PC487(a) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
129	CC25401 & 25540 DOUGHERTY, CHRISTOPHER D	Felony	2-3-5		
130	RT19705(a)(1) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
131	RT19705(a)(1) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		
132	RT19705(a)(1) DOUGHERTY, CHRISTOPHER D	Felony	16-2-3		

PC1054.3

INFORMAL REQUEST FOR DISCOVERY

The undersigned, certifying upon information and belief, complains that in the County of San Diego, State of California, the Defendant(s) did commit the following crime(s):

CHARGES

COUNT 1 - GRAND THEFT OF PERSONAL PROPERTY

On or about September 21, 2013, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of ALICIA ARMENTA, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 2 - THEFT FROM ELDER/DEPENDENT ADULT (OVER \$950)

On or about September 21, 2013, CHRISTOPHER D DOUGHERTY, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, fraud, and Penal Code Section 530.5 proscribing identity theft with respect to the property and personal identifying information of an elder, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 3 - FALSE STATEMENT IN CONNECTION WITH SALE OF A SECURITY

On or about September 21, 2013, CHRISTOPHER D DOUGHERTY did unlawfully offer to sell and sold a security in this state to ALICIA ARMENTA, a member of the public, by means of written and oral communications which included untrue statements of material facts and omitted to state material facts necessary in order to make the statement made, in the light of the circumstances under which they were made, not misleading, in violation of CORPORATION CODE SECTION 25401 AND 25540.

COUNT 4 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between June 11, 2015 and October 10, 2017, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of HENRY AUSTIN/SIXTA LOYO, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 5 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between June 11, 2015 and October 10, 2017, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

CHARGES (cont'd)

COUNT 6 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between November 20, 2015 and September 14, 2018, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of DONALD BIAGI/CHERYL BIAGI, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 7 - THEFT FROM ELDER/DEPENDENT ADULT (OVER \$950)

On or about and between November 20, 2015 and September 14, 2018, CHRISTOPHER D DOUGHERTY, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, fraud, and Penal Code Section 530.5 proscribing identity theft with respect to the property and personal identifying information of an elder, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 8 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between November 20, 2015 and September 14, 2018, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

COUNT 9 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between January 8, 2015 and June 26, 2017, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of JERRY COLE/ANITA COLE, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 10 - THEFT FROM ELDER/DEPENDENT ADULT (OVER \$950)

On or about and between January 8, 2015 and June 26, 2017, CHRISTOPHER D DOUGHERTY, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, fraud, and Penal Code Section 530.5 proscribing identity theft with respect to the property and personal identifying information of an elder, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

CHARGES (cont'd)

COUNT 11 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between January 8, 2015 and June 26, 2017, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

COUNT 12 - GRAND THEFT OF PERSONAL PROPERTY

On or about September 1, 2016, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of ROBERT JOE FREE, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 13 - THEFT FROM ELDER/DEPENDENT ADULT (OVER \$950)

On or about September 1, 2016, CHRISTOPHER D DOUGHERTY, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, fraud, and Penal Code Section 530.5 proscribing identity theft with respect to the property and personal identifying information of an elder, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 14 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about September 1, 2016, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

COUNT 15 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between June 12, 2015 and January 4, 2018, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of DEBORAH GERLACK, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 16 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between June 12, 2015 and January 4, 2018, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

CHARGES (cont'd)

COUNT 17 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between September 11, 2015 and March 17, 2016, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of MARY GILBERT, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 18 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between September 11, 2015 and March 17, 2016, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

COUNT 19 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between December 14, 2015 and August 2, 2017, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of JAMES HORN/HOLLY HORN, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 20 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between December 14, 2015 and August 2, 2017, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

COUNT 21 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between September 25, 2015 and August 31, 2016, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of TOKIKO HUNT/DAVID HUNT, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

CHARGES (cont'd)

COUNT 22 - THEFT FROM ELDER/DEPENDENT ADULT (OVER \$950)

On or about and between September 25, 2015 and August 31, 2016, CHRISTOPHER D DOUGHERTY, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, fraud, and Penal Code Section 530.5 proscribing identity theft with respect to the property and personal identifying information of an elder, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 23 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between September 25, 2015 and August 31, 2016, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

COUNT 24 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between March 12, 2015 and January 22, 2016, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of JAMES KAVANAGH / ROBIN KAVANAGH, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 25 - THEFT FROM ELDER/DEPENDENT ADULT (OVER \$950)

On or about and between March 12, 2015 and January 22, 2016, CHRISTOPHER D DOUGHERTY, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, fraud, and Penal Code Section 530.5 proscribing identity theft with respect to the property and personal identifying information of an elder, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 26 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between March 12, 2015 and January 22, 2016, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

CHARGES (cont'd)

COUNT 27 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between May 5, 2015 and May 18, 2017, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of JEFFREY KISER / PATTI KISER, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 28 - THEFT FROM ELDER/DEPENDENT ADULT (OVER \$950)

On or about and between May 5, 2015 and May 18, 2017, CHRISTOPHER D DOUGHERTY, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, fraud, and Penal Code Section 530.5 proscribing identity theft with respect to the property and personal identifying information of an elder, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 29 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between May 5, 2015 and May 18, 2017, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

COUNT 30 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between October 3, 2013 and April 19, 2016, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of JANICE LEITNER, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 31 - THEFT FROM ELDER/DEPENDENT ADULT (OVER \$950)

On or about and between October 3, 2013 and April 19, 2016, CHRISTOPHER D DOUGHERTY, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, fraud, and Penal Code Section 530.5 proscribing identity theft with respect to the property and personal identifying information of an elder, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

CHARGES (cont'd)

COUNT 32 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between October 3, 2013 and April 19, 2016, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

COUNT 33 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between April 20, 2015 and July 21, 2017, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of DANIEL PENDLETON / JANET PENDLETON, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 34 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between April 20, 2015 and July 21, 2017, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

COUNT 35 - GRAND THEFT OF PERSONAL PROPERTY

On or about September 20, 2017, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of DANIEL PENDLETON / SANDRA PENDLETON, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 36 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about September 20, 2017, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

COUNT 37 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between July 3, 2013 and January 27, 2015, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of MARTHA PITTSO, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

CHARGES (cont'd)

COUNT 38 - THEFT FROM ELDER/DEPENDENT ADULT (OVER \$950)

On or about and between July 3, 2013 and January 27, 2015, CHRISTOPHER D DOUGHERTY, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, fraud, and Penal Code Section 530.5 proscribing identity theft with respect to the property and personal identifying information of an elder, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 39 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between July 3, 2013 and January 27, 2015, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

COUNT 40 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between January 4, 2017 and May 26, 2017, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of CAROL POULIOT, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 41 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between January 4, 2017 and May 26, 2017, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

COUNT 42 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between June 9, 2015 and March 7, 2017, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of MELVIN RADER / HELEN RADER, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

CHARGES (cont'd)

COUNT 43 - THEFT FROM ELDER/DEPENDENT ADULT (OVER \$950)

On or about and between June 9, 2015 and March 7, 2017, CHRISTOPHER D DOUGHERTY, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, fraud, and Penal Code Section 530.5 proscribing identity theft with respect to the property and personal identifying information of an elder, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 44 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between June 9, 2015 and March 7, 2017, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

COUNT 45 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between September 22, 2015 and June 6, 2016, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of ROSALIA SALINAS, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 46 - THEFT FROM ELDER/DEPENDENT ADULT (OVER \$950)

On or about and between September 22, 2015 and June 6, 2016, CHRISTOPHER D DOUGHERTY, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, fraud, and Penal Code Section 530.5 proscribing identity theft with respect to the property and personal identifying information of an elder, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 47 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between September 22, 2015 and June 6, 2016, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

CHARGES (cont'd)

COUNT 48 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between January 6, 2014 and March 30, 2017, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of STEVEN SHAFER, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 49 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between January 6, 2014 and March 30, 2017, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

COUNT 50 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between April 7, 2014 and March 15, 2018, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of ALAN SILVER / ALEICA SILVER, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 51 - THEFT FROM ELDER/DEPENDENT ADULT (OVER \$950)

On or about and between April 7, 2014 and March 15, 2018, CHRISTOPHER D DOUGHERTY, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, fraud, and Penal Code Section 530.5 proscribing identity theft with respect to the property and personal identifying information of an elder, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 52 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between April 7, 2014 and March 15, 2018, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

CHARGES (cont'd)

COUNT 53 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between August 9, 2016 and May 31, 2017, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of GEORGE SNYDER / JANET SNYDER, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 54 - THEFT FROM ELDER/DEPENDENT ADULT (OVER \$950)

On or about and between August 9, 2016 and May 31, 2017, CHRISTOPHER D DOUGHERTY, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, fraud, and Penal Code Section 530.5 proscribing identity theft with respect to the property and personal identifying information of an elder, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 55 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between August 9, 2016 and May 31, 2017, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

COUNT 56 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between June 3, 2015 and May 2, 2018, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of JOHN SPRUILL, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 57 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between June 3, 2015 and May 2, 2018, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

CHARGES (cont'd)

COUNT 58 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between December 15, 2013 and September 15, 2015, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of MELBA SUMMERS, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 59 - THEFT FROM ELDER/DEPENDENT ADULT (OVER \$950)

On or about and between December 15, 2013 and September 15, 2015, CHRISTOPHER D DOUGHERTY, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, fraud, and Penal Code Section 530.5 proscribing identity theft with respect to the property and personal identifying information of an elder, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 60 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between December 15, 2013 and September 15, 2015, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

COUNT 61 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between June 25, 2013 and March 22, 2018, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of JEFFREY TANIYAMA / HARRIET TANIYAMA, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 62 - THEFT FROM ELDER/DEPENDENT ADULT (OVER \$950)

On or about and between June 25, 2013 and March 22, 2018, CHRISTOPHER D DOUGHERTY, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, fraud, and Penal Code Section 530.5 proscribing identity theft with respect to the property and personal identifying information of an elder, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

CHARGES (cont'd)

COUNT 63 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between June 25, 2013 and March 22, 2018, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

COUNT 64 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between August 3, 2015 and April 11, 2016, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of BRIAN TAYLOR /SHARON TAYLOR, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 65 - THEFT FROM ELDER/DEPENDENT ADULT (OVER \$950)

On or about and between August 3, 2015 and April 11, 2016, CHRISTOPHER D DOUGHERTY, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, fraud, and Penal Code Section 530.5 proscribing identity theft with respect to the property and personal identifying information of an elder, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 66 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between August 3, 2015 and April 11, 2016, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

COUNT 67 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between March 23, 2015 and August 21, 2017, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of STEVEN TEMPLETON, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

CHARGES (cont'd)

COUNT 68 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between March 23, 2015 and August 21, 2017, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

COUNT 69 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between March 18, 2014 and January 8, 2018, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of ELENA TOTTEN, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 70 - THEFT FROM ELDER/DEPENDENT ADULT (OVER \$950)

On or about and between March 18, 2014 and January 8, 2018, CHRISTOPHER D DOUGHERTY, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, fraud, and Penal Code Section 530.5 proscribing identity theft with respect to the property and personal identifying information of an elder, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 71 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between March 18, 2014 and January 8, 2018, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

COUNT 72 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between August 8, 2013 and April 27, 2017, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of DAVID VEGA / SHARON VEGA, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

CHARGES (cont'd)

COUNT 73 - THEFT FROM ELDER/DEPENDENT ADULT (OVER \$950)

On or about and between August 8, 2013 and April 27, 2017, CHRISTOPHER D DOUGHERTY, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, fraud, and Penal Code Section 530.5 proscribing identity theft with respect to the property and personal identifying information of an elder, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 74 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between August 8, 2013 and April 27, 2017, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

COUNT 75 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between August 19, 2015 and May 3, 2016, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of RICHARD WARNOCK / CAROL WARNOCK, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 76 - THEFT FROM ELDER/DEPENDENT ADULT (OVER \$950)

On or about and between August 19, 2015 and May 3, 2016, CHRISTOPHER D DOUGHERTY, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, fraud, and Penal Code Section 530.5 proscribing identity theft with respect to the property and personal identifying information of an elder, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 77 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between August 19, 2015 and May 3, 2016, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

CHARGES (cont'd)

COUNT 78 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between March 25, 2015 and January 10, 2018, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of EDWARD WEINGARDT / SANDRA WEINGARDT, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 79 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between March 25, 2015 and January 10, 2018, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

COUNT 80 - GRAND THEFT OF PERSONAL PROPERTY

On or about November 15, 2016, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of EARL WEINS, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 81 - THEFT FROM ELDER/DEPENDENT ADULT (OVER \$950)

On or about November 15, 2016, CHRISTOPHER D DOUGHERTY, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, fraud, and Penal Code Section 530.5 proscribing identity theft with respect to the property and personal identifying information of an elder, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 82 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about November 15, 2016, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

AGGRAVATED WHITE COLLAR CRIME ENHANCEMENT: And it is further alleged that said defendant, CHRISTOPHER D DOUGHERTY, committed two or more related felonies, a material element of which is fraud and embezzlement, which involved a pattern of related felony conduct which involved the taking and resulted in the loss by another person and entity of more than five hundred thousand dollars (\$500,000), within the meaning of PENAL CODE SECTIONS 186.11(a)(1) and (a)(2).

CHARGES (cont'd)

COUNT 83 - GRAND THEFT OF PERSONAL PROPERTY

On or about August 14, 2015, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of OFELIA ARELLANO, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 84 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between August 14, 2015 and November 15, 2016, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

COUNT 85 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between January 1, 2015 and September 25, 2017, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of DANNY BURROUGHS, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 86 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between January 1, 2015 and September 25, 2017, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

COUNT 87 - GRAND THEFT OF PERSONAL PROPERTY

On or about March 26, 2012, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of LEAH CREER, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 88 - THEFT FROM ELDER/DEPENDENT ADULT (OVER \$950)

On or about March 26, 2012, CHRISTOPHER D DOUGHERTY, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, fraud, and Penal Code Section 530.5 proscribing identity theft with respect to the property and personal identifying information of an elder, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

CHARGES (cont'd)

COUNT 89 - USING FALSE STATEMENTS IN THE SALE OF A SECURITY

On or about March 26, 2012, CHRISTOPHER D DOUGHERTY did unlawfully offer to sell and sell a security in this state by means of a written and oral communication which included an untrue statement of a material fact and omitted to state a material fact necessary in order to make the statement made, in the light of the circumstances under which they were made, not misleading, in violation of CORPORATION CODE SECTION 25401.

COUNT 90 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between March 10, 2011 and October 6, 2015, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of BOBBY DAWN DERSHEM, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 91 - THEFT FROM ELDER/DEPENDENT ADULT (OVER \$950)

On or about and between March 10, 2011 and October 6, 2015, CHRISTOPHER D DOUGHERTY, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, fraud, and Penal Code Section 530.5 proscribing identity theft with respect to the property and personal identifying information of an elder, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 92 - USING FALSE STATEMENTS IN THE SALE OF A SECURITY

On or about and between March 10, 2011 and October 6, 2015, CHRISTOPHER D DOUGHERTY did unlawfully offer to sell and sell a security in this state by means of a written and oral communication which included an untrue statement of a material fact and omitted to state a material fact necessary in order to make the statement made, in the light of the circumstances under which they were made, not misleading, in violation of CORPORATION CODE SECTION 25401.

COUNT 93 - GRAND THEFT OF PERSONAL PROPERTY

On or about June 14, 2017, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of SOUN FENGTHONG, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

CHARGES (cont'd)

COUNT 94 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about June 14, 2017, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

COUNT 95 - GRAND THEFT OF PERSONAL PROPERTY

On or about January 5, 2018, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of MARLENE CAROL HUNT, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 96 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about January 5, 2018, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

COUNT 97 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between January 1, 2015 and July 25, 2017, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of FLORENCE HUNT AND WOLFGANG FLECK, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 98 - THEFT FROM ELDER/DEPENDENT ADULT (OVER \$950)

On or about and between January 1, 2015 and July 25, 2017, CHRISTOPHER D DOUGHERTY, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, fraud, and Penal Code Section 530.5 proscribing identity theft with respect to the property and personal identifying information of an elder, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 99 - SALE OF UNQUALIFIED SECURITY

On or about and between January 1, 2015 and July 25, 2017, CHRISTOPHER D DOUGHERTY did unlawfully sell and offer to sell a security in this state in an issuer transaction to FLORENCE HUNT AND WOLFGANG FLECK, a member of the public, which security was not qualified or exempted, in violation of CORPORATION CODE SECTION 25110 AND 25540(a).

CHARGES (cont'd)

COUNT 100 - GRAND THEFT OF PERSONAL PROPERTY

On or about March 24, 2017, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of RENEE LAWSON, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 101 - THEFT FROM ELDER/DEPENDENT ADULT (OVER \$950)

On or about March 24, 2017, CHRISTOPHER D DOUGHERTY, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, fraud, and Penal Code Section 530.5 proscribing identity theft with respect to the property and personal identifying information of an elder, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 102 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between September 13, 2013 and April 7, 2016, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of LINDA LEDBETTER, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 103 - THEFT FROM ELDER/DEPENDENT ADULT (OVER \$950)

On or about and between September 13, 2013 and April 7, 2016, CHRISTOPHER D DOUGHERTY, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, fraud, and Penal Code Section 530.5 proscribing identity theft with respect to the property and personal identifying information of an elder, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 104 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between September 13, 2013 and April 7, 2016, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

CHARGES (cont'd)

COUNT 105 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between January 1, 2014 and June 19, 2017, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of DONALD MARSHALL, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 106 - THEFT FROM ELDER/DEPENDENT ADULT (OVER \$950)

On or about and between January 1, 2014 and June 19, 2017, CHRISTOPHER D DOUGHERTY, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, fraud, and Penal Code Section 530.5 proscribing identity theft with respect to the property and personal identifying information of an elder, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 107 - USING FALSE STATEMENTS IN THE SALE OF A SECURITY

On or about and between January 1, 2014 and June 19, 2017, CHRISTOPHER D DOUGHERTY did unlawfully offer to sell and sell a security in this state by means of a written and oral communication which included an untrue statement of a material fact and omitted to state a material fact necessary in order to make the statement made, in the light of the circumstances under which they were made, not misleading, in violation of CORPORATION CODE SECTION 25401.

COUNT 108 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between January 1, 2014 and June 19, 2017, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of JAMES MARSHALL, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 109 - THEFT FROM ELDER/DEPENDENT ADULT (OVER \$950)

On or about and between January 1, 2014 and June 19, 2017, CHRISTOPHER D DOUGHERTY, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, fraud, and Penal Code Section 530.5 proscribing identity theft with respect to the property and personal identifying information of an elder, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

CHARGES (cont'd)

COUNT 110 - USING FALSE STATEMENTS IN THE SALE OF A SECURITY

On or about and between January 1, 2014 and June 19, 2017, CHRISTOPHER D DOUGHERTY did unlawfully offer to sell and sell a security in this state by means of a written and oral communication which included an untrue statement of a material fact and omitted to state a material fact necessary in order to make the statement made, in the light of the circumstances under which they were made, not misleading, in violation of CORPORATION CODE SECTION 25401.

COUNT 111 - GRAND THEFT OF PERSONAL PROPERTY

On or about July 17, 2017, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of VICENTE MENDEZ, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 112 - THEFT FROM ELDER/DEPENDENT ADULT (OVER \$950)

On or about July 17, 2017, CHRISTOPHER D DOUGHERTY, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, fraud, and Penal Code Section 530.5 proscribing identity theft with respect to the property and personal identifying information of an elder, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 113 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about July 17, 2017, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

COUNT 114 - GRAND THEFT OF PERSONAL PROPERTY

On or about June 14, 2017, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of EUGENE NAJERA, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

CHARGES (cont'd)

COUNT 115 - THEFT FROM ELDER/DEPENDENT ADULT (OVER \$950)

On or about June 14, 2017, CHRISTOPHER D DOUGHERTY, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, fraud, and Penal Code Section 530.5 proscribing identity theft with respect to the property and personal identifying information of an elder, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 116 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about June 14, 2017, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

COUNT 117 - GRAND THEFT OF PERSONAL PROPERTY

On or about March 9, 2016, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of TODD OLSON, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 118 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about March 9, 2016, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

COUNT 119 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between January 1, 2014 and October 7, 2015, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of THOMAS AND JUDITH RALLS, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

CHARGES (cont'd)

COUNT 120 - THEFT FROM ELDER/DEPENDENT ADULT (OVER \$950)

On or about and between January 1, 2014 and October 7, 2015, CHRISTOPHER D DOUGHERTY, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, fraud, and Penal Code Section 530.5 proscribing identity theft with respect to the property and personal identifying information of an elder, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 121 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between January 1, 2014 and October 7, 2015, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

COUNT 122 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between January 1, 2014 and May 4, 2016, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of JERRY SUSSMAN AND CELIA GUIDA, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 123 - THEFT FROM ELDER/DEPENDENT ADULT (OVER \$950)

On or about and between January 1, 2014 and May 4, 2016, CHRISTOPHER D DOUGHERTY, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, fraud, and Penal Code Section 530.5 proscribing identity theft with respect to the property and personal identifying information of an elder, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 124 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between January 1, 2014 and May 4, 2016, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

CHARGES (cont'd)

COUNT 125 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between May 4, 2015 and May 30, 2017, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of GEORGE AND ROBERTA THOMPSON, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 126 - THEFT FROM ELDER/DEPENDENT ADULT (OVER \$950)

On or about and between May 4, 2015 and May 30, 2017, CHRISTOPHER D DOUGHERTY, did unlawfully violate a provision of law proscribing theft, embezzlement, forgery, fraud, and Penal Code Section 530.5 proscribing identity theft with respect to the property and personal identifying information of an elder, knowing and having reason to know that the victim was an elder, when the money, labor, goods, services, and real and personal property taken and obtained was of a value exceeding nine hundred fifty dollars (\$950) in violation of PENAL CODE SECTION 368(d).

COUNT 127 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between May 4, 2015 and May 30, 2017, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

COUNT 128 - GRAND THEFT OF PERSONAL PROPERTY

On or about and between May 30, 2017 and August 13, 2018, CHRISTOPHER D DOUGHERTY did unlawfully take and steal money and personal property of WHITNEY WILSON, of a value in excess of Nine Hundred Fifty Dollars (\$950), in violation of PENAL CODE SECTION 487(a).

COUNT 129 - FRAUD IN CONNECTION WITH OFFER, PURCHASE, SALE OF A SECURITY

On or about and between May 30, 2017 and August 13, 2018, CHRISTOPHER D DOUGHERTY, in connection with the offer, sale and purchase of a security, directly and indirectly, did willfully and unlawfully make an untrue statement of material fact, or did make an omission of a material fact, in violation of CORPORATION CODE SECTIONS 25401 AND 25540(b).

COUNT 130 - MAKE AND SUBSCRIBE A FRAUDULENT RETURN

On or about September 9, 2016, CHRISTOPHER D DOUGHERTY did willfully, unlawfully, and voluntarily, with intent to violate a legal duty known to him/her, make and subscribe a return, statement, and other document, containing a material statement which was false and inaccurate, and verified the statement by a written declaration that was made under penalty of perjury, when he/she did not believe the material statement to be true and correct, to wit: underreporting of annual income, in violation of REVENUE AND TAXATION CODE SECTION 19705(a)(1).

CHARGES (cont'd)

It is further alleged that within the meaning of Penal Code 803(c) that the crimes alleged in Counts 1 through 82 were discovered no earlier than November 2017. At that time, a complaint was filed with the California Department of Insurance by American Equity Life Insurance Company regarding Dougherty's posing as a policyholder while inquiring about a withdrawal request.

COUNT 131 - MAKE AND SUBSCRIBE A FRAUDULENT RETURN

On or about October 6, 2017, CHRISTOPHER D DOUGHERTY did willfully, unlawfully, and voluntarily, with intent to violate a legal duty known to him/her, make and subscribe a return, statement, and other document, containing a material statement which was false and inaccurate, and verified the statement by a written declaration that was made under penalty of perjury, when he/she did not believe the material statement to be true and correct, to wit: underreporting of annual income, in violation of REVENUE AND TAXATION CODE SECTION 19705(a)(1).

COUNT 132 - MAKE AND SUBSCRIBE A FRAUDULENT RETURN

On or about October 24, 2018, CHRISTOPHER D DOUGHERTY did willfully, unlawfully, and voluntarily, with intent to violate a legal duty known to him/her, make and subscribe a return, statement, and other document, containing a material statement which was false and inaccurate, and verified the statement by a written declaration that was made under penalty of perjury, when he/she did not believe the material statement to be true and correct, to wit: underreporting of annual income, in violation of REVENUE AND TAXATION CODE SECTION 19705(a)(1).

PENAL CODE SECTION 803(C):

It is further alleged that within the meaning of Penal Code 803(c) that the crimes alleged in Counts 1 through 82, and 87 - 89 were discovered no earlier than November 2017. At that time, a complaint was filed with the California Department of Insurance by American Equity Life Insurance Company regarding Dougherty's posing as a policyholder while inquiring about a withdrawal request.

ALLEGATION AS TO ALL COUNTS:

AGGRAVATED WHITE COLLAR CRIME ENHANCEMENT: And it is further alleged that said defendant, CHRISTOPHER D DOUGHERTY, committed two or more related felonies, a material element of which is fraud and embezzlement, which involved a pattern of related felony conduct which involved the taking and resulted in the loss by another person and entity of more than five hundred thousand dollars (\$500,000), within the meaning of PENAL CODE SECTIONS 186.11(a)(1) and (a)(2).

NOTICE: Any defendant named on this complaint who is on criminal probation in San Diego County is, by receiving this complaint, on notice that the evidence presented to the court at the preliminary hearing on this complaint is presented for a dual purpose: the People are seeking a holding order on the charges pursuant to Penal Code Section 872 and simultaneously, the People are seeking a revocation of the defendant's probation, on any and all such probation grants, utilizing the same evidence, at the preliminary hearing. Defenses to either or both procedures should be considered and presented as appropriate at the preliminary hearing.

NOTICE: Any defendant named on this complaint who is on Mandatory Supervision in San Diego County is, by receiving this complaint, on notice that the evidence presented to the court at the preliminary hearing on this complaint is presented for a dual purpose: the People are seeking a holding order on the charges pursuant to Penal Code Section 872 and simultaneously, the People are seeking a revocation of the defendant's Mandatory Supervision pursuant to Penal Code Sections 1170(h)(5)(B) and 1203.2, on any and all such grants, utilizing the same evidence, at the preliminary hearing. Defense to either or both procedures should be considered and presented as appropriate at the preliminary hearing.

~~Pursuant to PENAL CODE SECTION 1054.5(b), the People are hereby informally requesting that defendant's counsel provide discovery to the People as required by PENAL CODE SECTION 1054.3.~~

MANDATORY STATE PRISON INCARCERATION: An executed sentence for a felony shall be served by defendant CHRISTOPHER D DOUGHERTY in state prison pursuant to PENAL CODE SECTIONS 1170(f) and (h)(3).

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT, CASE NUMBER CD281450, CONSISTS OF 132 COUNTS.

Executed at City of San Diego, County of San Diego, State of California, on August 5, 2019.

COMPLAINANT

INFORMATION

SUMMER STEPHAN
District Attorney
County of San Diego
State of California
by:

Date

Deputy District Attorney